



East Renfrewshire Council
ECO4 – Flexible Eligibility
Statement of Intent

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Local Authority Name: East Renfrewshire Council

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This statement sets out East Renfrewshire Council's flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 – March 2026.

This statement sets out East Renfrewshire Council's flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 – March 2026. The ECO4 scheme will focus on supporting low income and vulnerable households. The scheme will improve the least energy efficient homes helping to meet the Government's fuel poverty and net zero commitments.

The Council welcomes the introduction of the ECO 4 Flex eligibility routes as it helps the Council achieve its plans to improve the homes of those in fuel poverty or vulnerable to the cold.

Identification of Households

Consideration will only be given to domestic properties, which are of private tenure unless the property is let by Social Landlord at or above market rate. Before collecting evidence to support eligibility, it must be established that the property is Standard Assessment Procedure (SAP) banding D, E, F or G for owner-occupied homes or E, F or G for privately rented homes. Under the 2nd criteria, only households which are E, F or G can be considered. The full list of criteria are set out below:

Route 1: Household Income: Households with a gross income of <£31,000, from all sources, regardless of property size, composition or region.

Route 2: Proxy Targeting: Households which are two of the following:

<ul style="list-style-type: none">• Homes in the Scottish Government's 2020 Index of Multiple Deprivation.
<ul style="list-style-type: none">• Receiving Council Tax rebates, based on low income.
<ul style="list-style-type: none">• Vulnerable living in a cold home, as determined by the National Institute for Health and Care Excellence, Guidance Recommendation 2 with the exception by under low-income. Full details can be found at https://www.nice.org.uk/guidance/NG6
<ul style="list-style-type: none">• A householder supported by a LA run scheme, that has been named and described by the LA as supporting low income and vulnerable households for the purposes of NICE Guideline.
<ul style="list-style-type: none">• A householder receiving free-school meals due to low-income.

<ul style="list-style-type: none"> • Referred to the Local Authority for energy support by their supplier, Citizens' advice or Citizens' Advice Scotland because they are having difficulty paying their gas and electricity bills.
<ul style="list-style-type: none"> • Households identified due through supplier debt data by their supplier, which have a pre-payment meter which has self-disconnected or received supplier Discretionary/Friendly credit within the last 13 weeks or are subject to a debt repayment plan with their energy supplier or a repaying fuel debt via a 3rd party. If a non-pre-payment meter is in situ, then the household could be eligible if the household has been in debt for >13 weeks and are subject to a debt repayment plan with their energy supplier or a repaying fuel debt via a 3rd party.

Currently the first and third criteria from Route 2 cannot be used in conjunction with one another, although this is subject to change.

Route 3: NHS Referrals: Households which have a low income, are vulnerable and where living in a cold home, would be to the detriment of the health of an occupant due to a health condition, such as a cardiovascular condition, respiratory disease, limited mobility or immunosuppression. Under these circumstances households can only be referred by an NHS Foundation Trust, an NHS Trust, a Health Board, a Local Health Board or a general medical practitioner provider.

Route 4: Bespoke Targeting: When a supplier or local authority propose a new route for identifying low income and vulnerable households. Under a new proposed route, more than 50% could not be in the 'Help to Heat' group and 75% of households must have at least one person living in fuel poverty. Alternatively, 90% of the identified households must be private rented and occupied by at least one person living in fuel poverty.

East Renfrewshire Context

The Scottish House Condition Survey (2019) estimated that 24.6% (approximately 613,000 households) of all households in Scotland are in fuel poverty. A household is said to be in fuel poverty when it is spending at least 10% of all income on fuel costs, and after paying for household costs and child care, the household cannot sufficiently afford to maintain an acceptable standard of living. In East Renfrewshire has the lowest rate of fuel poverty of all Scottish Local Authorities, with only 13% of households believed to be experiencing fuel poverty. This is significantly lower than was estimated in the 2015 edition of the Scottish House Condition Survey, and East Renfrewshire Council will continue to take action to mitigate this, whilst faced with the challenges of an ageing population and the cost of living crisis.

With approximately 40,000 households in East Renfrewshire, 13% being in fuel poverty represents some 5,200 households. Of those, 7% are said to be in extreme fuel poverty – spending at least 20% of all income on fuel costs, and after paying for child care, the household cannot sufficiently afford to maintain an acceptable standard of living. Again this is the lowest rate of the 32 Scottish Local Authorities, which have an average of rate of 12%.

11% of those experiencing fuel poverty in East Renfrewshire are owner-occupiers. The National Records of Scotland also estimate that East Renfrewshire has an average of 2.38 people per household, higher than any of Scotland's other local authorities – nationally, the average is 2.14.

The Scottish Index of Multiple Deprivation identifies parts of two data zones in East Renfrewshire as being in the 20% most deprived areas in Scotland. Both of these zones, within Auchenback and Dunterlie, East Arthurlie and Dovecothall are located in Barrhead. One part of the Dunterlie, East Arthurlie and Dovecothall area has been identified in the 5% most deprived areas in Scotland.

SMID data is an important tool for identifying households' risk of fuel poverty as their ranking is determined by considering seven categories, four of which (income, health, employment levels and geographical access) are linked to fuel poverty.

East Renfrewshire Council will support the most vulnerable households, which are in the 20% most deprived areas in Scotland, according to SMID.

East Renfrewshire Council will utilise Flexible Eligibility to reduce fuel poverty in our communities, targeting homes in 20% most deprived SMID data zones and those locally where there are high levels of deprivation, relating to housing, household income, employment and health, despite not being in the 20% most deprived areas.

A 'Referral Network' and process will be managed by East Renfrewshire Council's Housing Service, who will promote, evaluate, prepare, quality control and consult on all applications prior to being given Declaration Approval. The Network will include local health practices, partner organisations and charities supporting the vulnerable subject to fuel poverty.

Households will be identified by the 'Referral Network' during the sign up process to identify the opportunity of funding support to enhance the energy efficiency of their homes. They will also ensure the householder has been provided with the Ofgem Privacy Notice, explaining how their data will be used. East Renfrewshire Council's Housing Service's use and management of data will conform to existing GDPR provisions, as detailed on our website, accessible at: <https://www.eastrenfrewshire.gov.uk/housing-services-privacy-notice>

East Renfrewshire Council's Housing Service's will also confirm current Referral Network Practices are compliant with GDPR Regulation prior to being accepted on to the Referral Network.

Evidence Check Confirmation

Details of each household that applies for assistance will held. Any action taken will be monitored and unspecified data on the features of the household obtained through the scheme will also be reviewed.

Among this information will be details of the households assessed and of those, how many were eligible, ineligible and how many improvements were subsequently carried out.

Eligibility will be monitored by East Renfrewshire Council's Housing Service, who will contact successful applicants, where declarations have been made, through to installation of materials delivered within an agreed 6 week timeframe. Once a Declaration Form has been signed, it will be valid for up to 18 months, or the duration of this obligation. This will guarantee the referral process works as intended and can be reviewed and altered as necessary to deliver the necessary level of customer service.

When East Renfrewshire Council's Housing Service receive a referral and necessary evidence, the Head of Environment will give it consideration, prior to final approval.

The relevant details for householders with LA Declarations which are approved, will be securely transferred to the contractor for technical survey and installation.

Governance

'The Referral Network' will be will the responsibility of East Renfrewshire Council's Housing Service, who will gather and protect appropriate data relevant to the application and confirm if the applicant adheres to the appropriate criteria. A Household Energy Efficiency Survey will be completed by the installation partner which will collect suitable data to determine if the household meets the correct criteria. The Council will retain details of any installations which take place as well of applications which do not require measures, to allow for a review of local levels of demand. Appropriate consultation, technical monitoring, validation of the promotion and installation process will be guaranteed by East Renfrewshire Council's Housing Service by a specific level of visits and consultations for households which have benefitted from the scheme. East Renfrewshire Council will receive this information on a monthly basis for consideration.

Applications forms will be completed by 'The Referral Network' and then be forwarded to East Renfrewshire Council's Housing Service for each household. Once this has verified as accurate, it will be passed to the agreed person(s) to be approved and signed, providing the application meets the necessary criteria.

Applications to be considered can be submitted to East Renfrewshire Council via the web page link, by email to Flex.Eco@eastrenfrewshire.gov.uk or by calling 0141 577 8579. Applications will primarily be submitted by our partner referral network organisations.

Continuous briefing, updates and quality assurance checks will be supplied to 'The Referral Network' to guarantee ongoing adherence to the scheme's regulations and objectives, as well as the expected standards of East Renfrewshire Council.

Declaration

Potentially eligible households should apply through East Renfrewshire Council or one of their approved ECO installers to ensure that they can either benefit from the scheme or be assessed for eligibility under the relevant programme.

The officer below will be responsible for checking and verifying declarations and associated evidence submitted on behalf of the local authority:



Signature:

Name: John Kean

Job Title: Compliance Officer (Gas and Energy)

Date of signature: 09 May 2023

Telephone: 0141 577 8579

Email: Flex.Eco@eastrenfrewshire.gov.uk

CEO or dedicated responsible person mandatory signature:

East Renfrewshire Council will administer the scheme according to BEIS' ECO4 Order and will identify eligible households via Ofgem's application process. The CEO of the Council will oversee the process of identifying eligible households under ECO4 Flex. The eligibility information will be stored securely in line with the Council's data protection policy, Information Commissioner's Office Data Sharing Code, and BEIS guidance.



Signature:

Name: Suzanne Conlin

Job Title: **Senior Housing Manager**

Date of signature: 09 May 2023

For any general enquiries relating to this Sol, please contact Flex.Eco@eastrenfrewshire.gov.uk